

## **Exhibit 4**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SAMIAM GROUP, LLC,  
Plaintiff,

v.

COOPERSBURG ASSOCIATES, INC. dba  
Coopersburg Sports,  
Defendant.

Case No. 22-cv-02256-JFL

**NOTICE OF DEPOSITION**

**TO:** Damon A. Neagle, Esq.  
Design IP, P.C.

**PLEASE TAKE NOTICE** that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiff will take the deposition by oral examination of the following person with respect to the allegations and claims asserted in the above-captioned matter. The deposition will be taken before a person authorized by law to administer oaths, to be used for all purposes permitted under the Federal Rules of Civil Procedure, and will continue from day to day until completed.

Deponent: Coopersburg Associates, Inc.

Location: **Epstein Drangel LLP**  
60 E. 42nd Street, Suite 1250  
New York, N.Y. 10165

Date: November 11, 2022, starting at 10:00 a.m.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiff intends to depose the Deponent and its corporate designee(s) as to the following topics:

- (a) all issues related to the preparation and content of the worksheets, CBS-0052 and -0053, including but not limited to all related paper and electronic invoices, receipts, communications, payments (check, wire, credit card, etc.), purchase orders, commission agreements, royalty agreements and ledger entries related to Defendant's total sales, commissions, royalties, revenues, cost of inventory,

- freight costs, production costs, cost of assembly, unsold inventory and net profits;
- (b) Defendant's knowledge of Plaintiff's THE BEER BAT product and patent;
  - (c) The creation, design, offer for sale and sale of Defendant's BEVERAGE BAT product.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Fed. R. Civ. P. 30(b)(6), Deponent must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on its behalf; and it may set out the matters on which each person designated will testify.

**PLEASE TAKE FURTHER NOTICE** that the above-named deponent must bring to the deposition the following documents: (1) all documents relating to the above-described topics, except for those previously produced in this matter; and (2) all documents reviewed in preparation to give testimony.

Date: October 27, 2022

//Robert L. Epstein//  
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